



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date December 7, 2005Time Start 12:45

Time Finish _____

Insp ID - 1500189

HAZARDOUS WASTE INSPECTION REPORT☐ **GENERATOR**☒ **S Q GENERATOR**Company name Land & Sea Forest Products Corporation I.D. Number PAD980830863Site Address 400 Rock Run Road Fairless Hills, PA 19030County Bucks Municipality Falls Township Zip 19030Name of Inspector Kevin Bauer, Waste Management SpecialistName & Title of Responsible Official H. Wade Carden, President & CEOPerson Interviewed H. Wade Carden Telephone (215) 295-5460

Mailing Address (if different from above) _____

Amount of Hazardous Waste Generated per Month: to be determined Pounds _____ Kgs _____**1. Site Characterization:**STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☒ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad**2. Universal Waste:** ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:Transporter Name Vernon Milling Company License Number PA-AH0640

Transporter Name _____ License Number _____

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
F035,D004,D007	CCA sludge / solids – no longer gen.	Terra First Vernon, AL
Non-hazardous	ACQ solids / liquid	Terra First Vernon, AL

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HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Land & Sea Forest Products Corp ID Number PAD980830863 Date 12/7/2005

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Identification Number	262a.10	262.12	H002
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Authorized transporters only	262a.10	262.12(c)	H003
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Subsequent notification requirements met	262a.12(b)		H004
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper manifest used	262a.10	262.21	H005
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests filled out correctly and completely	262a.20		H006
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests signed and routed properly	262a.23(a)	262.23	H007
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Specified records retained for three years	262a.10	262.40(c)	H014
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Exception reporting procedures followed	262a.42	262.42	H016
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Spill reporting procedures followed	262a.10	262.34(d)	H017
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PPC plan developed and implemented	262a.10	262.34(a)	H018
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements followed for international shipments	262a.10	262.50 262.60	H019
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Source reduction strategy prepared and available (LQG only)	262a.100		H020
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

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BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Land & Sea Forest Products Corp. ID Number PAD980830863 Date 12/7/2005

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers of hazardous waste in good condition	265a.1	265.171	H026
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers and stored waste compatible	265a.1	265.172	H027
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed to prevent leaks	265a.1	265.173(b)	H029
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container storage areas inspected at least weekly	265a.1	265.174	H031
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper containment and collection systems in place	265a.179		H033
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

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Site Name Land & Sea Forest Products Corp. ID Number PAD980830863 Date 12/7/2005

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STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				Containment Buildings (Subchapter T)			
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Meets special requirements if liquids present	265a.1	265.1101(b)	H062
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1)(i)	H063
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1)(ii)	H064
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1)(iii)	H065
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1)(iv)	H066
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
				Drip Pads (Subchapter S)			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Release reporting requirements met	265a.1	265.443(m)	H076
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

Commonwealth of Pennsylvania
Department of Environmental Protection
Bureau of Land Recycling & Waste Management

Inspection Report Comments

Date of Inspection December 7, 2005 Identification Number PAD980830863

Company/Facility/Site Land & Sea Forest Products Corporation ("Land & Sea")

A routine hazardous waste generator inspection of Land & Sea Forest Products Corporation ("Land & Sea") located in Falls Township, Bucks County was conducted on December 7, 2005, by Mr. Kevin Bauer of the Department. Mr. H. Wade Carden, Jr. (President / CEO) was present for the facility. The following observations were noted:

1. Operations at the facility were discussed. As noted during the Department's previous inspection, the facility ceased the production of treated lumber utilizing CCA (Chromate copper arsenate) in December 2003. The drip pad and storage tanks were power washed, and all liquid and solids were removed and drummed as a hazardous waste (F035). The facility now utilizes ACQ (Ammonia copper quaternary) for the treating of lumber. Land & Sea has been handling the drums of ACQ contaminated material as a hazardous waste. As noted after the previous inspection, the waste ACQ solids / liquids do not need to be handled as a hazardous waste. The pad, sumps, and equipment were power washed, and under option 3 - phased closure of a USEPA technical guidance for closure of a CCA pad (option chosen by Land & Sea), the resultant waste generated after the cleaning of the pad does not need to be handled as a RCRA hazardous waste. It is now a residual waste. If Land & Sea would like to handle the ACQ as a residual waste, it should work with its waste disposal company (Terra First) on recharacterizing the waste stream.

2. In the meantime, Land & Sea has been drumming any solids generated by the ACQ process and labeling the drum as a hazardous waste.

3. Land & Sea has been completing weekly drum storage and pad inspections. Even after the ACQ is classified as a residual waste, Land & Sea should continue with the operation, inspection, and maintenance requirements of drip pads. The facility should continue to ensure that the pad inspections are completed weekly and have a secondary inspector when the primary is not available.

4. An engineer has requested that two small areas of the pad be resealed before the annual certification is completed. Upon sealing of the pad, which will occur when there is a warm stretch of weather this winter, the engineer will complete an inspection and certification of the pad.

5. To date (2005), Land & Sea has shipped 600 pounds of waste ACQ solids. Vernon Milling transports the waste to Terra First of Vernon, AL.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Harold C. Coker Date 12/7/05
Inspector (signature) Kevin C. Bauer Date 12/7/05



**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT**

Inspection Date October 19, 2004Time Start 13:55

Time Finish _____

1388210

HAZARDOUS WASTE INSPECTION REPORT☐ **GENERATOR**☒ **S Q GENERATOR**Company name Land & Sea Forest Products Corporation I.D. Number PAD980830863Site Address 400 Rock Run Road Fairless Hills, PA 19030County Bucks Municipality Falls Township Zip 19030Name of Inspector Kevin Bauer, Waste Management SpecialistName & Title of Responsible Official H. Wade Carden, President & CEOPerson Interviewed H. Wade Carden, Zach Ryan Crunkleton Telephone (215) 295-5460

Mailing Address (if different from above) _____

Amount of Hazardous Waste Generated per Month: to be determined Pounds _____ Kgs _____**1. Site Characterization:**STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☒ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad**2. Universal Waste:** ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:Transporter Name Vernon Milling Company License Number PA-AH0640

Transporter Name _____ License Number _____

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
F035,D004,D007	CCA sludge / solids – no longer gen.	Terra First Vernon, AL
F035?	ACQ solids / liquid	Terra First Vernon, AL

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DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Land & Sea Forest Products Corp ID Number PAD980830863 Date 10/19/2004

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Identification Number	262a.10	262.12	H002
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Authorized transporters only	262a.10	262.12(c)	H003
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Subsequent notification requirements met	262a.12(b)		H004
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper manifest used	262a.10	262.21	H005
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests filled out correctly and completely	262a.20		H006
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests signed and routed properly	262a.23(a)	262.23	H007
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Specified records retained for three years	262a.10	262.40(c)	H014
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Exception reporting procedures followed	262a.42	262.42	H016
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Spill reporting procedures followed	262a.10	262.34(d)	H017
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PPC plan developed and implemented	262a.10	262.34(a)	H018
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements followed for international shipments	262a.10	262.50 262.60	H019
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Source reduction strategy prepared and available (LQG only)	262a.100		H020
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

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**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name Land & Sea Forest Products Corp. ID Number PAD980830863 Date 10/19/04

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers of hazardous waste in good condition	265a.1	265.171	H026
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers and stored waste compatible	265a.1	265.172	H027
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed to prevent leaks	265a.1	265.173(b)	H029
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container storage areas inspected at least weekly	265a.1	265.174	H031
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper containment and collection systems in place	265a.179		H033
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

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**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name Land & Sea Forest Products Corp. ID Number PAD980830863 Date 10/19/04

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STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				Containment Buildings (Subchapter T)			
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Meets special requirements if liquids present	265a.1	265.1101(b)	H062
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1)(i)	H063
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1)(ii)	H064
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1)(iii)	H065
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1)(iv)	H066
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
				Drip Pads (Subchapter S)			
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Release reporting requirements met	265a.1	265.443(m)	H076
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

Commonwealth of Pennsylvania
Department of Environmental Protection
Bureau of Land Recycling & Waste Management

Inspection Report Comments

Date of Inspection October 19, 2004 Identification Number PAD980830863

Company/Facility/Site Land & Sea Forest Products Corporation ("Land & Sea")

A routine hazardous waste generator inspection of Land & Sea Forest Products Corporation ("Land & Sea") located in Falls Township, Bucks County was conducted on October 19, 2004, by Mr. Kevin Bauer of the Department. Mr. H. Wade Carden, Jr. (President / CEO) and Mr. Zach Crunkleton were present for the facility. The following observations were noted:

1. Operations at the facility were discussed. In December 2003, the facility ceased the production of treated lumber utilizing CCA (Chromate copper arsenate). The drip pad and storage tanks were power washed, and all liquid and solids were removed and drummed. In March 2004, twenty-five (25) drums of CCA waste (F035) were manifested off-site to Terra First of Vernon, AL.

2. The facility now utilizes ACQ (Ammonia copper quaternary) for the treating of lumber. Since the changeover, the facility has shipped drums of ACQ contaminated material two times. In June 2004, two (2) drums – 300 pounds and in September 2004, 500 pounds were shipped to Terra First. The waste ACQ does not appear to be classified characteristically or by listing as a hazardous waste but has been shipped as F035 due to the fact that the pad has not been officially closed according to 40 CFR 265.445. The pad was power washed but no confirmatory sampling of the pad or subsoils occurred. The Department will research this issue. Land & Sea should still complete a waste determination on the waste ACQ to ensure that it does not meet any of the characteristics. A copy of the MSDS for Osmose NW 100-C (ACQ) was obtained.

3. The treatment (autoclave) and storage tank room as well as the drip pad were inspected. The entire operation is under roof and is contained. Drillage from the operation is collected in sumps and pumped into the storage tanks for reuse. Solids collected from the drip pad and sumps are drummed for disposal. On the pad, there was a small area that needed repair. There were no drums containing waste at the time of the inspection.

4. The Department will research details concerning the requirements for the official closure of the pad (see the Department's March 16, 2004 letter to Land & Sea). In the meantime, Land & Sea should be conducting weekly inspections of the drip pad and have it certified annually by a professional engineer registered within PA.

5. The facility's training program, PPC information and procedures, drip pad inspections, old engineer certifications, and manifests were reviewed.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Kathleen Loftus Date 10-22-04
Inspector (signature) Kevin C Bauer Date 10/19/04

Commonwealth of Pennsylvania
Department of Environmental Protection
Bureau of Land Recycling & Waste Management

Inspection Report Comments

Date of Inspection October 19, 2004 Identification Number PAD980830863

Company/Facility/Site Land & Sea Forest Products Corporation ("Land & Sea")

6. The facility is currently listed by the USEPA as a LQG of hazardous waste but recently renotified on September 13, 2004 as a SQG. As of October 13, 2004, the USEPA database (RCRAInfo) did not have the updated status. The Department will look into this. If the ACQ waste is non-hazardous, Land & Sea may be able to renotify as a CEG or as not generating.

7. The facility generates waste oil, which is stored in a tank within a contained building. The tank should be labeled as "used oil". Waste Zep DynaClean II (parts washer) also generated at the site is handled as a non-hazardous waste. An updated MSDS should be obtained.

Within fourteen (14) days of the receipt of this report, Land & Sea should submit a schedule and plan detailing what actions will be taken to address above noted issues.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____

Date

Inspector (signature) _____

Date



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 8/25/03
Time Start 1:00 PM
Time Finish 4:00 PM

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR ☐ S Q GENERATOR

Company name Land & Sea Forest Products I.D. Number PA09E0830803
Site Address 4100 Rock Run Road, Fairless Hills.
County Bucks Municipality Falls Twp. Zip 19030
Name of Inspector Chen Niemeyer
Name & Title of Responsible Official H. Wade Carden, Jr. -> President & CEO
Person Interviewed Sam & George Kite Telephone (215) 295-5460
Mailing Address (if different from above) (same)
Amount of Hazardous Waste Generated per Month: _____ Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☒ Drip Pad Other _____
PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____
GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name Vernon Milling Company License Number PA-AH06040
Transporter Name _____ License Number _____
Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
FC35	haz. waste solid (Arsenic, Chromium)	Terra First - Al Storage operations
FL35	haz. waste liquid (Arsenic, Chromium)	Vernon, AL 35592 205-698-8915

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Land & Sea ID Number PA0980830863 Date Aug. 25, 2003

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Identification Number	262a.10	262.12	H002
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Authorized transporters only	262a.10	262.12(c)	H003
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Subsequent notification requirements met	262a.12(b)		H004
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper manifest used	262a.10	262.21	H005
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests filled out correctly and completely	262a.20		H006
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests signed and routed properly	262a.23(a)	262.23	H007
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Specified records retained for three years	262a.10	262.40(c)	H014
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Exception reporting procedures followed	262a.42	262.42	H016
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Spill reporting procedures followed	262a.10	262.34(d)	H017
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	PPC plan developed and implemented	262a.10	262.34(a)	H018
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements followed for international shipments	262a.10	262.50 262.60	H019
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Source reduction strategy prepared and available (LQG only)	262a.100		H020
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name Land & Sea ID Number PA0980830263 Date Aug 25

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers of hazardous waste in good condition	265a.1	265.171	H026
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers and stored waste compatible	265a.1	265.172	H027
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed to prevent leaks	265a.1	265.173(b)	H029
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Container storage areas inspected at least weekly	265a.1	265.174	H031
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper containment and collection systems in place	265a.179		H033
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name Land a Sea ID Number PAD980830863 Date Aug 25, 2003

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				Containment Buildings (Subchapter T)			
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Meets special requirements if liquids present	265a.1	265.1101(b)	H062
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1)(i)	H063
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1)(ii)	H064
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1)(iii)	H065
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1)(iv)	H066
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
				Drip Pads (Subchapter S)			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Release reporting requirements met	265a.1	265.443(m)	H076
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection Aug. 25, 2003 Identification Number PAW980030863Company/Facility/Site Name Land & Sea Forest Products

A hazardous waste generator inspection was conducted by Chen Niemeyer, Solid Waste Specialist for the Department. Present for the facility was Mr. George Kite, treasurer, and Mr. H. Wade Carden, Jr. president and CEO.

The facility pressure treats wood/lumber with CCA (Chromium, Copper & Arsenic). This chemical will no longer be used after Dec. 2003 due to federal regulations. Most waste that is generated on-site is from debris falling into the pit area under the machines. Liquid hazardous waste is generated from clean outs of the tanks.

A site walk over was conducted. The waste storage area was observed. Drums ~~storing~~ storing waste were not labeled and did not have the contents

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature)

Kathleen Loftus

Date

3/28/03

Inspector (signature)

Chen H. Niemeyer

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection Aug 25, 2003 Identification Number PA0980830803Company/Facility/Site Name Land & Sea Forest Products

Accurately identified. The drip pad was observed. Mr. Carden explained that after being treated the lumber will sit in this area for 3-4 days before being stacked in the yard. The drip pad area has a dedicated fork-lift for this area. Mr. Carden also explained that the sump in this area pumps any liquid back into the storage tanks to be re-used in the pressure treating process.

Paperwork was reviewed. The facility notified EPA on Aug. 30, 2001 as being a Large Quantity generator of hazardous waste. Manifests were reviewed. The facility has had 2 shipments of hazardous off-site of the year of 2003. 3/17/03 → approx 7,000 pounds. 6/19/03 → 200 pounds. The facility does have an emergency plan, however they do not have a

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Person interviewed (signature)

Kathleen Loftus

Date

8/28/03

Inspector (signature)

Cheri A. Niemeyer

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection

Aug 25, 2003

Identification Number

PHD950920003

Company/Facility/Site Name

Land & Sea

PPC plan developed. The facility does not have
a Source Reduction Strategy.

Violations are as follows:

1) Inspection log for waste storage was not up-to-date.

This is contrary to 40 CFR 265.174

2) Waste drums did not have ~~and~~ a label with

the accumulation date, "Hazardous Waste" or

contents identified. This is contrary to

40 CFR 262.34(a)(2), 40 CFR 262.34(a)(3) and

Solid Waste Management Act 6018.403(b)(2).

** These violations were corrected at the time
of this inspection.

3) The facility does not have personnel trained

yearly. This is contrary to 40 CFR 262.34(a)(4) & (d).

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Person interviewed (signature)

Kathleen Loftus

Date

8/28/03

Inspector (signature)

John A. Diermeyer

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection Aug. 25, 2003Identification Number PAD960830863Company/Facility/Site Name Lana & Sea

4) The facility does not have a Source Reduction Strategy. This is contrary to 25 Pa Code 262a.100.

3 violations outstanding.

Results of this inspection were discussed with Kathy Loftus before leaving the facility.

Copies of the regulations and SRS manual, PPC plan manual and other compliance guides were left on-site during this inspection.

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Person interviewed (signature)

Kathleen Loftus

Date

8/28/03

Inspector (signature)

John A. Dumeige

SENT BY:

8-29-1 10:26AM

DAN RAVIV ASSOC. -

160927545117-2091

EPA Form 8700-12, before
completing this form. The
information requested here is
required by law (Section 3010 of
the Resource Conservation and
Recovery Act).



United States Environmental Protection Agency

Waste Activity.

Date Received
(For Official Use Only)

SEP 14 2001

PA Oper
WCM

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

<input type="checkbox"/> A. Initial Notification	<input checked="" type="checkbox"/> B. Subsequent Notification (Complete Item C)	C. Installation's EPA ID Number
		P A D 9 8 0 8 3 0 8 6 3

II. Name of Installation (Include company and specific site name)

L a n d a n d S e a F o r e s t P r o d u c t s

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street
4 0 0 R o c k R u n R o a d
Street (Continued)

City or Town State Zip Code

F a i r l e s s H i l l s P A 1 9 0 3 0 -

County Code County Name

0 1 7 B u c k s

IV. Installation Mailing Address (See instructions)

Street or P.O. Box c/o Lewis Goldshore, Esq.

1 0 1 G r o v e r s M i l l R o a d S u i t e 1 0 4

City or Town State Zip Code

L a w r e n c e v i l l e N J 0 8 6 4 8 -

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last) (First)

C a r d e n H. W a d e

Job Title Phone Number (Area Code and Number)

P r e s i d e n t 6 0 9 - 2 3 9 - 9 1 1 0 Ext:

VI. Installation Contact Address (See instructions)

FAX: (609) 239- 9171

A. Contact Address Location Mailing B. Street or P.O. Box

City or Town State Zip Code

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

L & S P r o p e r t i e s o f P A L L C

Street, P.O. Box, or Route Number

1 T a l l T i m b e r s D r i v e

City or Town State Zip Code

P r i n c e t o n N J 0 8 5 4 0 -

Phone Number (Area Code and Number) B. Land Type C. Owner Type D. Change of Owner Indicator Date Changed

6 0 9 - 2 3 9 - 9 1 1 0 P P Yes X No 0 8 3 1 2 0 0 1

SENT BY:

8-29-1 10:27AM

DAN RAVIV ASSOC. →

16092754511--2091 # 04

QSA No. 02-20-01

ID - For Official Use Only

PA D 9 8 0 8 3 0 8 6 3

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to Instructions)

A. Hazardous Waste Activities

1. Generator (See Instructions)
- ☒ a. Greater than 1000 kg/mo (2,200 lbs.)
- ☐ b. 100 to 1000 kg/mo (220-2,200 lbs.)
- ☐ c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
- ☐ a. For own waste only
- ☐ b. For commercial purposes
- Mode of Transportation
- ☐ 1. Air
- ☐ 2. Rail
- ☐ 3. Highway
- ☐ 4. Water
- ☐ 5. Other - specify _____
- ☐ 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity, see Instructions.
- ☐ 4. Exempt Boiler and/or Industrial Furnace
- ☐ a. Smelting, Melting, and Refining Furnace Exemption
- ☐ b. Small Quantity On-Site Burner Exemption
- ☐ 5. Underground Injection Control

C. Used Oil Management Activities

1. Used Oil Transporter/Transfer Facility - Indicate Type(s) of Activity(ies)
- ☐ a. Transporter
- ☐ b. Transfer Facility
2. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
- ☐ a. Processor
- ☐ b. Re-refiner
- ☐ 3. Off-Specification Used Oil Burner
4. Used Oil Fuel Marketer
- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

B. Universal Waste Activity

☐ Large Quantity Handler of Universal Waste

IX. Description of Hazardous Wastes (Use additional sheets if necessary)

A. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See Instructions if you need to list more than 12 waste codes.)

1 5 0 3 5	2	3	4	5	6
7	8	9	10	11	12

B. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24; See Instructions if you need to list more than 4 toxicity characteristic waste codes.)

1. Ignitable (D001) ☒
2. Corrosive (D002) ☒
3. Reactive (D003) ☐
4. Toxicity Characteristic ☒

(List specific EPA hazardous waste number(s) for the Toxicity Characteristic Contaminant(s))

1 D 0 0 4	2 D 0 0 7	3 D 0 1 8	4
--------------	--------------	--------------	---

C. Other Wastes. (State-regulated or other wastes requiring a handler to have an I.D. number; See Instructions.)

1	2	3	4	5	6
---	---	---	---	---	---

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature

Name and Official Title (Type or print)

Date Signed

XI. Comments

H. Wade Carden, Jr., President

8/29/01

BA4, AK, 9/13/01 Ofn: Commonwealth Wood Preservers, Inc.

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section IV of the booklet for addresses.)

**SZAFERMAN, LAKIND, BLUMSTEIN, WATTER,
BLADER, LEHMANN & GOLDSHORE, P.C.**
ATTORNEYS AT LAW

Arnold C. Lakind
Barry D. Szaferman
Jeffrey P. Blumstein
Paul N. Watter**
Steven Blader
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Lewis Goldshore***
Gerald B. Schenkman*
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Of Counsel

Quakerbridge Executive Center, Suite 104
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Lawrenceville, New Jersey 08648
Tel: 609.275.0400 Fax: 609.275.4511
www.szaferman.com

August 30, 2001

Cathyann Pisciotto-Goldberg*
Demery Johnson Roberts
Stuart A. Tucker
Brian G. Paul
Victoria Rivera-Cruz
Annie C. Kalac
Janine R. Danks*
Caitlin L. Aviss
Allison Anderson Acevedo*

*NJ & PA Bars
**NJ & NY Bars
***NJ, NY, & PA Bars

via Certified Mail/RRR

USEPA/RCRA Program
841 Chestnut Street
Philadelphia, PA 19107

**RE: Land and Sea Forest Products of Pennsylvania Corporation
Notification of Regulated Waste Activity**

To Whom It May Concern:

Enclosed, please find, a Notification of Regulated Waste Activity form for the above referenced Corporation.

Should you wish to discuss this matter in greater detail, please feel free to contact me.

Very truly yours,



LEWIS GOLDSHORE

LG/tav
Encl.

- ☐ a. Treatment or disposal at permitted on-site facility.
 Permit Number _____ Treatment _____ Disposal _____
- ☐ b. Delivered to a PA haz. waste facility. Name of facility: _____

- ☐ c. Delivered to a PA municipal or residual facility with Form S approval. Name of facility.

- ☒ d. Delivered to an approved out-of-state facility. Name of facility. Terra First
Alabama
- ☐ e. Delivered to a reclamation, reuse, or recycle facility. Name of facility: _____

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 12/18/96 Identification Number PAD980 830 863Company/Facility/Site Name Commonwealth Wood Preservers

A routine small quantity hazardous waste inspection was conducted at Commonwealth Wood Preservers. Present during the inspection were Chris Smolar of the Department and David Van Broner of Commonwealth Wood Preservers.

The hazardous waste generation and storage areas were examined. The lumber is preserved with certain chemicals. The wastes generated by this process are Chromium, Copper, and Arsenic. These are generated in the form of scrapings from the pressure treater, and processed liquids which undergo water treatment. A filter cake containing chromium, copper, and arsenic is generated. The fluids which comprise the liquid to be treated are the excess liquids which drip from the pressure treater, and from the drip pad where the lumber dries.

The records for the facility were examined and found to be in order. The facility has regular manifests for shipments which are generated every 90 days. None of the shipments recorded for 1996 exceed 2300 lbs.

No violations were observed.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) David Van Broner

Date

Inspector (signature) Christopher Smolar

Date

Henri

12/28/89

Contact Person/Position

Street 5604 City Line Ave
City Hampton State Va Zip 23661

Street _____
City _____ State _____ Zip _____

County Code

Operator Name

Used Oil Fuel Activities

--- 6. Off-Spec Used Oil Fuel

--- A. Gen Mark to Burn

--- B. Other Marketer

--- C. Burner

--- 7. Spec Used Oil Fuel Mark

Utility Boiler	Ind. Boiler	Ind. Furnace
1	1	1
2	2	2
3	3	3
4	4	4
5	5	5
6	6	6
7	7	7
8	8	8
9	9	9
10	10	10
11	11	11
12	12	12
13	13	13
14	14	14
15	15	15
16	16	16
17	17	17
18	18	18
19	19	19
20	20	20
21	21	21
22	22	22
23	23	23
24	24	24
25	25	25
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93	93	93
94	94	94
95	95	95
96	96	96
97	97	97
98	98	98
99	99	99
100	100	100

--- Air --- Rail --- Highway --- Water --- Other

W1 Card

12 Card

Non-Reg Ind_____ (c303)

1	2	3	4
5	6	7	8
9	10	11	12
13	14	15	16
17	18	19	20
21	22	23	24
25	26	27	28
29	30	31	32
33	34	35	36
37	38	39	40
41	42	43	44
45	46	47	48
49	50	51	52
53	54	55	56
57	58	59	60
61	62	63	64
65	66	67	68
69	70	71	72
73	74	75	76
77	78	79	80
81	82	83	84
85	86	87	88
89	90	91	92
93	94	95	96
97	98	99	100

ID — For Official Use Only									
C									T/A C
W									1

X. Description of Hazardous Wastes (continued from front)

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.21 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

<input checked="" type="checkbox"/> 1. Ignitable (D001)	<input type="checkbox"/> 2. Corrosive (D002)	<input type="checkbox"/> 3. Reactive (D003)	<input type="checkbox"/> 4. Toxic (D000)
---	--	---	--

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature <i>X. Marc Z...</i>	Name and Official Title (type or print) <i>Marc Z...</i>	Date Signed <i>11-22-89</i>
----------------------------------	---	--------------------------------

RECEIVED
PA STATION

DEC 04 1989

EPA, R3

Department of Environmental Resources

1875 New Hope Street
Norristown, PA 19401
215-270-1948

GCN (lg)

March 7, 1989

Commonwealth Wood Preservers of PA, Inc.
400 Rock Run Road
Penn Warner Park
Fairless Hills, PA 19030

Attention: Carl Settle, Operations Manager

Re: Hazardous Waste Inspection
PAD 980 830 863
Falls Township
Bucks County

Dear Mr. Settle:

NOTICE OF VIOLATION

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 75.260 through 75.267 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

75.262(e)(7) - The facility generates a dry, solid waste. Manifests are currently being incorrectly completed. The quantity of waste is being listed as gallons. The drums should be weighed and the weight of the drums recorded on the manifest.

A facility that generates small quantities of wastes per month (less than 1000 kg per month), but accumulates and ships over 1000 kg of waste must still comply with the Large Quantity Generator Regulations in Pennsylvania. Some of these requirements are manifesting in the waste, filing quarterly reports with the Department, and preparation of a PPC Plan. Commonwealth Wood Preservers should limit waste shipments to 1000 kg or less to avoid additional requirements.

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations. The Department's inspection report contains time periods of completion of remedial actions. These reports are either enclosed or have been previously supplied to you. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

Commonwealth Wood Preservers of PA, Inc.
March 7, 1989

- 2 -

If you have any questions concerning this matter, please feel free to contact me at 270-1948.

Very truly yours,

ROBERT F. FULTON
Waste Management Specialist

cc: Compliance
Div. of Compliance and Monitoring
~~EPA~~
Ms. Kurtz
Falls Township
Re30 SW060.12

Hazardous Waste Inspection Report
Generators - Part A

(SQG)

EPA

Date of inspection 2/7/89 Time start 10:00 Time finish 11:00
Name of inspector ROBERT FULTON
Company, installation name COMMONWEALTH WOOD PRESERVERS OF PA, INC
Location 400 ROCK RUN RD, PENNWARNER PARK, GLESS HILLS, PA 19030
County BUCKS Municipality FALL TWP
Identification number PAD 980 830 863
Name of responsible official CARL SETTLE
Title OPERATIONS MGR
Mailing address SAME AS ABOVE
Area code and telephone number 215-295-5460
Name of person interviewed CARL SETTLE
Title SAME
Mailing address (if different from above) "
Area code and telephone number "

1. Current waste handling method:

- | | | | | | |
|----|--|-------------------------------------|-----------------------------------|--|----------------------------------|
| a. | <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. | <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. | <input checked="" type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input checked="" type="checkbox"/> disposal | |
| d. | <input type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. 344 kg./mo.
b. 4130 kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number:

D004, D007 (CALIFORNIA WASTE)

4. Are hazardous wastes transported off-site by the generator? ☐ Yes ☒ No

**Hazardous Waste Inspection Report
Generators — Part B**

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			75.262
X				Hazardous waste determination, copies available		(b)
X				Identification number		(c)(1)
X				Hazardous waste shipments offered only to licensed transporters		(c)(4)
X				Authorization received from TSD facility for wastes shipped off-site		(d)
	X			PA manifest used for intrastate shipments		(e)(2)
X				Disposer state manifest or EPA format manifest used for out-of-state shipments		(e)(3)
			X	Manifests filled out properly and completely		(e)(7)
X				Manifests routed properly and within time limits (7 days)		(e)(14) or (15)
			X	Proper U.S. DOT shipping containers or packages		(f)(1)(i)
X				Shipping containers marked and labeled according to U.S. DOT		(f)(1)(ii)
	X			Containers of 110 gal. or less marked with required PA label		(f)(1)(iii)
		X		Placards offered to transporter		(f)(2)
		X		Wastes accumulated on-site for less than 90 days		(g)(1)(i)
X				Wastes stored in proper containers and properly marked and labeled		(g)(1)(ii)
X				Containers managed in accordance with 75.265(q)(1)–(9)		(g)(1)(iii)
X				Containers clearly marked with accumulation date and visible for inspection		(g)(1)(iv)
X				Records retained at designated location for 20 years		(h)
		X		Quarterly reports submitted to the Department		(i)
		X		Exception reporting procedures followed		(j)
		X		Hazardous waste disposal plan, if required		(l)
		X		Spill reporting procedures followed		(m)(1)
		X		Preparedness, Prevention and Contingency Plan and implemented		(m)(5)
		X		Special requirements followed for international shipments		(o)
	X			On the job or classroom personnel training program (75.265(f))		(g)(1)(6)
X				Drum accumulation area inspected weekly as per 75.265(q)(5)		(g)(1)(iii)

Inspection Report Comments

Date of Inspection

2/7/89

Identification Number

PA 880 830 863

Company/Facility/Site Name

COMM. WOOD PRESERVERS OF PA, INC.

FACILITY PRODUCES PRESSURE TREATED WOOD

MR. CARL SETTLE CONDUCTED TOUR OF FACILITY

WASTE IS DRY FILTER CAUSE CONTAINING CHROMIC ACID, ARSENIC PENTOXIDE AND COPPER SLUDGE.

FACILITY PRODUCES LESS THAN 1000 KG PER MONTH OF HAZARDOUS WASTE. HOWEVER, FACILITY IS ACCUMULATING GREATER THAN 1000 KG AND MAKING LARGE QUANTITY SHIPMENTS. (I.E. 2660 KG AND 1470 KG IN 10/88 AND 5/88 RESP) BECAUSE FACILITY IS MAKING LARGE QUANTITY SHIPMENTS, MUST COMPLY W/ RES IN 75.262 AND COMPLY W/ 90 DAY STORAGE REQUIREMENTS, QUARTERLY REPORTS TO DEPT, PTC PLAN ETC. FACILITY CAN AVOID ANY OF THE GENERATOR REQUIREMENTS BY MAKING SHIPMENTS OF 1000 KG OR LESS.

MANIFESTS ARE CURRENTLY BEING FILLED OUT IMPROPERLY. THE KIT/VOL. BOX IS BEING LABELLED AS GALLONS. THIS SHOULD BE CHANGED TO POUNDS OR KILOGRAMS AS MAIL IS DRY.

ALSO, FACILITY MADE A SHIPMENT OF WASTE LIQUID FROM THE CLEANING OF THE EFFLUENT TANK BOTTOM.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve as a formal notification (Notice of Violation) of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature)

Carl Settle

Date

2/7/89

Inspector (signature)

Robert J. ...

Date

2/2/89

Page 3 of 4

Inspection Report Comments

Date of Inspection 2/7/89 Identification Number PA 980-830 863
Company/Facility/Site Name Comm. WOOD PRESERVERS OF PA, INC.

THIS SHIPMENT SHOULD HAVE BEEN MANIFESTED
FOR HAZ. WASTE. NO MANIFEST WAS FOUND, ONLY
ATTACHED BILL OF LADING. IF A MANIFEST EXISTS,
FACILITY SHOULD FORWARD A COPY TO THIS OFFICE.

WASTES NOW BEING TRANSPORTED BY
KOPPERS CO PAID 108 066 341

TSD IS CHEMICAL WASTE MGT INC
EMELLE AL
ALD 000 622 464

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve as a formal notification (Notice of Violation) of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature)

Inspector (signature)

Date

Date

Page

of

DESK MEMORANDUM

SUBJECT

EPA ID Numbers

TO

DATE SENT

FROM

~~DATE RECEIVED~~

PLEASE CALL:	APPROVAL	SEE ME
RETURNED YOUR CALL	AS REQUESTED	COMMENT
INFORMATION	PREPARE REPLY/REPORT	NOTE AND FILE

RECEIVED BY

DATE

TIME

ROUTE	INITIAL	DATE	ROUTE	INITIAL	DATE

MESSAGE

Attached notification for
Commonwealth Wood
Preservers, Inc. Needs ID
number.

Thanks,
Cindy

BUREAU OF SOLID WASTE MANAGEMENT

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

RECEIVED
Facilities Management Section

DEC 15 1983

U.S. EPA, Region III

I. INSTALLATION'S EPA I.D. NUMBER			
PA D 150830963			
II. NAME OF INSTALLATION			
Commonwealth Wood Preservers, Inc.			
III. INSTALLATION MAILING ADDRESS			
STREET OR P.O. BOX			
P.O. Box 57			
CITY OR TOWN			ST. ZIP CODE
Morrisville			PA 19067
IV. LOCATION OF INSTALLATION			
STREET OR ROUTE NUMBER			MUNICIPALITY
400 Rock Run Road			Falls Township
CITY OR TOWN		ST. ZIP CODE	COUNTY
Fairless Hills		PA 19030	Rock
V. INSTALLATION CONTACT			
NAME AND TITLE (last, first, & job title)			PHONE NO. (area code & no.)
Davis, Jefferson E. III Vice President/Operations			804 247 3621
VI. OWNERSHIP			
A. NAME OF INSTALLATION'S LEGAL OWNER			
Millard M. Davis, President			
B. TYPE OF OWNERSHIP			
(Enter the appropriate letter into box)			
F = FEDERAL M = NON-FEDERAL			
M			
VII. SIC CODES (4-digit in order of priority)			
A. FIRST		C. THIRD	
2491 (specify) Wood Preserving		(specify)	
B. SECOND		D. FOURTH	
(specify)		(specify)	
VIII. TYPE OF HAZARDOUS WASTE ACTIVITY			
<input checked="" type="checkbox"/> A. GENERATION	<input type="checkbox"/> C. STORE	<input type="checkbox"/> E. TRANSPORTATION (complete item IX)	<input type="checkbox"/> G. REUSE, RECYCLE, RECLAIM
<input type="checkbox"/> B. TREAT	<input type="checkbox"/> D. DISPOSE	<input type="checkbox"/> F. PERMIT BY RULE	<input type="checkbox"/> H. OTHER (specify)
IX. MODE OF TRANSPORTATION (transporters only)			
<input type="checkbox"/> A. AIR	<input type="checkbox"/> B. RAIL	<input type="checkbox"/> C. HIGHWAY	<input type="checkbox"/> D. WATER
<input type="checkbox"/> E. OTHER (specify)			
X. EXISTING ENVIRONMENTAL PROGRAM PERMITS			
A. NPDES (Discharges to Surface Water)		D. PSD (Air Emissions from Proposed Sources)	
B. UIC (Underground Injection of Fluids)		E. SOLID WASTE	
C. RCRA (Hazardous Waste)		F. OTHER	
		(specify)	
XI. TYPE OF NOTIFICATION			
Mark "X" in appropriate box to indicate whether this is your installation's first notification of hazardous waste activity, or notification of a change of general information, hazardous waste handled, or hazardous waste activity. If you check B, C, D, E, or F, attach a letter of explanation (SEE INSTRUCTIONS).			
<input checked="" type="checkbox"/> A. FIRST NOTIFICATION	<input type="checkbox"/> C. DELETION OF A WASTE	<input type="checkbox"/> E. DELETION OF AN ACTIVITY	
<input type="checkbox"/> B. CHANGE OF GENERAL INFORMATION	<input type="checkbox"/> D. ADDITION OF A WASTE	<input type="checkbox"/> F. ADDITION OF AN ACTIVITY	

CONTINUE ON REVERSE

XI DESCRIPTION OF HAZARDOUS WASTES (Continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from §75.261(h)(2) for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from §75.261(h)(2) each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
0 0 0 4					
19	20	21	22	23	24
0 0 0 7					
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from §75.261(h)(4) for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See §75.261(g)(2) through (5))

☐ 1. IGNITABLE

☐ 2. CORROSIVE

☐ 3. REACTIVE

☐ 4. EXTREMELY TOXIC

XII CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME and OFFICIAL TITLE (Type or Print)

DATE SIGNED

JEFFERSON E. DAVIS II
VICE PRESIDENT

12/8/83

FOR OFFICIAL USE ONLY

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

Department of Environmental Resources
Bureau of Solid Waste Management
Division of Hazardous Waste Management
P.O. Box 2063
Harrisburg, Pennsylvania 17120



Joan Henry
PA/W.Va Branch
U.S.E.P.A.
Hazardous Materials, Toxics & Pesticides
6th & Walnut Sts
Phila, Pa 19106



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (*RCRA*). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• PAD 98 083 0863

INSTALLATION ADDRESS

Jefferson Davis, Vice Pres
Commonwealth Wood Preservers Inc
P.O.Box 57
Morrisville, PA 19067

400 Rock Run RD
Fairless Hills, PA 19030

